Commonwealth of Kentucky Division for Air Quality

RESPONSE TO COMMENTS

On the Conditional Major Draft Permit F-06-073
The Nielsen Company
Florence, Kentucky 41042
Date: 5/11/2007
Elahe Houshmand, Reviewer

SOURCE ID: 21-015-00082

SOURCE A.I. #: 222

ACTIVITY ID: APE20060001

Comments on The Nielsen Company Draft Conditional Major Air Quality Permit were submitted by Michael E. Kertis, EHS Manager.

Source's Comments - F-06-073 Permit:

Section B, Group Requirements for Emission Points, Operating Limitations, Condition 1:

As uncontrolled printing presses, a condition specifying "Operation and maintenance of the presses shall be practiced in accordance with manufacturer's specifications unless otherwise allowed or prohibited in this permit." appears unwarranted and unnecessary. We request that this condition be removed.

Section B, Group Requirements for Emission Points, Operating Limitations, Condition 2:

To clarify that the vapor pressure limitation on fountain solutions applies only to the VOC portion of the solvent and not to exempt compounds or water, we believe revision of this condition to specify a maximum <u>VOC composite</u> vapor pressure of 10 mm Hg @ 20° C is appropriate.

Section B, Group Requirements for Emission Points, Specific Recordkeeping Requirements, Conditions 1-3:

Consistent with out comment on Section B, Group Requirements for Emission Points, Operating Limitations, Condition 1 above, the recordkeeping activities associated with maintenance of these printing presses appear unwarranted and unnecessary. We request that these conditions be removed.

Division's response: The Division concurs with the comments and has revised the permit as suggested by the source.

These comments ask for minor changes and do not require another public notice.